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Attorneys for Creditor
Lake Oswego Corporation

UNITED STATES BANKRUPTCY COURT

DISTRICT OF OREGON

In re

Blue Moon Property Group, LLC,
Debtor-in-Possession.

Case No. 22-31873-thp11

**UNOPPOSED MOTION FOR AN
ORDER CONVERTING HEARING TO
A STATUS CONFERENCE AND
REMOVING CORRESPONDING
FILING DEADLINES**

Lake Oswego Corporation (“**LOC**”), through its undersigned counsel, hereby moves this Court for an order converting the August 15, 2023 hearing to a status conference and removing the corresponding filing deadlines in advance of the August 15 hearing set forth in the Court’s record of proceeding [Dkt. No. 128]. LOC conferred with the counsel for the Debtor regarding the relief requested in this Motion and hereby represents that the Debtor does not oppose the relief sought herein. LOC and the Debtor have reached a settlement in principle on the allowed amount

of LOC's claim in this case and the parties are currently negotiating a mutually-agreeable settlement agreement to memorialize the terms of their settlement.

In support thereof, LOC states as follows:

1. On March 31, 2023, the Debtor filed its objection to LOC's claim (the "***Claim Objection***"). [Dkt. #63].
2. On July 12, 2023, the Court issued a partial oral ruling and set a deadline of July 28, 2023, for LOC to file a supplemental declaration regarding the current amount due with respect to its proof of claim. LOC's July 28, 2023 deadline was extended to August 2, 2023 by order of this Court.
3. LOC respectfully requests that the hearing currently scheduled for August 15, 2023 be treated as a status conference and the corresponding filing deadlines in advance of the August 15 hearing set forth in the Court's record of proceeding [Dkt. No. 128] be removed and cancelled.
4. A conversion of the hearing into a status conference and the removal and cancellation of the filing deadlines in advance of the August 15 hearing are warranted because the parties have agreed in principle to the terms of a settlement with respect to the Claim Objection, are currently negotiating the terms of the agreement that will memorialize the settlement, and would like to use the time allotted during the August 15 hearing to apprise the Court of the parties' agreement.

For the reasons stated herein, LOC submits there is good cause for granting the relief requested in the Motion and respectfully requests that the Court enter an order substantially in the form attached hereto as **Exhibit A**.

DATED: August 2, 2023.

STOEL RIVES LLP

/s/ Bryan T. Glover

Amy Edwards, OSB No. 012492

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EXHIBIT A

(Proposed Form of Order)

UNITED STATES BANKRUPTCY COURT
DISTRICT OF OREGON

In re

Blue Moon Property Group, LLC,
Debtor-in-Possession.

Case No. 22-31873-thp11

**ORDER GRANTING UNOPPOSED
MOTION FOR AN ORDER
CONVERTING HEARING TO A
STATUS CONFERENCE AND
REMOVING CORRESPONDING
FILING DEADLINES**

THIS MATTER having come before the Court upon the Unopposed Motion for an Order Converting Hearing to a Status Conference and Removing Corresponding Filing Deadlines [ECF No. ____] (the “**Motion**”), and the Court being duly advised in the premises and finding good cause; now therefore;

IT IS HEREBY ORDERED that the August 15, 2023, hearing will be treated as a status conference and the corresponding filing deadlines in advance of the August 15 hearing are removed and cancelled.

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CONVERTING HEARING TO A STATUS CONFERENCE AND REMOVING
CORRESPONDING FILING DEADLINES

I certify that I have complied with the requirements of LBR 9021-1(a).

Presented by:

STOEL RIVES LLP

/s/ Bryan T. Glover

Amy Edwards, OSB No. 012492

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cc: List of Interested Parties

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ECF Participants:

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CERTIFICATE OF SERVICE

I certify that on the date below, I caused to be electronically filed UNOPPOSED MOTION FOR AN ORDER CONVERTING HEARING TO A STATUS CONFERENCE AND REMOVING CORRESPONDING FILING DEADLINES with the Clerk of Court using the CM/ECF system, which will in turn automatically generate a Notice of Electronic Filing to all parties in the case who are registered users of the CM/ECF system.

I further certify that on the date below, I served a copy of the above-referenced document on Douglas Ricks at Vanden Bos & Chapman LLP, via email address doug@vbcattorneys.com.

DATED: August 2, 2023.

/s/ Jeannie Lihs

Jeannie Lihs, Paralegal